

LAW OFFICES OF BEN M. GONEK

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Ben M. Gonek
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October 4, 2018

Honorable Anthony P. Patti, United States Magistrate Judge
Theodore Levin United States Courthouse
231 Lafayette Boulevard, Room 524
Detroit, Michigan 48226

Re: State Farm v. Elite Health Centers, et al., 16-cv-13040
Request for Leave to File Motion for Protective Order

Dear Judge Patti:


Jayson Rosett seeks leave to file a motion for a protective order. Mr. Joelson, counsel for some of the other defendants has noticed up Mr. Rosett's deposition for October 26, 2018. I requested that any deposition of Mr. Rosett be scheduled for at least 90 days from now. Mr. Joelson declined my request.

The protective order we are seeking would preclude Jayson Rosett's deposition from being taken for at least 60 days. Mr. Rosett is currently the target of two federal investigations that involve conduct directly related to some of the allegations State Farm has made in this case. (See attached target letters from the respective Assistant United States Attorneys handling the respective investigations). Mr. Rosett expects to be charged in at least one case in early November 2018. We are in negotiations with the Government for resolutions in both cases and expect to have some type of resolution in both cases within the next 60 days. At that time, Mr. Rosett will be in a better position to make an informed decision as to whether or not he wants to exercise his Fifth Amendment rights if deposed.

Under existing case law, Mr. Rosett could ask the Court to grant a complete stay of proceedings while his criminal case is pending. However, we do not believe that a stay or proceedings is necessary at this juncture and simply want to facilitate this case moving along in a productive manner.

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read 'B. M. Gonek', with a stylized flourish at the end.

Ben M. Gonek



**U.S. Department of Justice
United States Attorney's Office
Eastern District of Michigan**

JULES M. DePORRE
Assistant United States Attorney

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600 Church Street
Flint, Michigan 48502
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May 17, 2018

Jayson Rosett
C/O Ben Gonek
500 Griswold St. Ste 2450,
Detroit, MI 48226-3421

Dear Mr. Rosett:

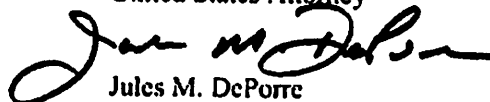
Please be advised that you are a target of a criminal investigation which is being conducted by the Federal Bureau of Investigation and a federal grand jury.

Before proceeding with this prosecution, I am offering you the opportunity to meet with me and the investigating agents to discuss the investigation. This meeting would have two purposes: 1) for you to provide any reasons why you should not be prosecuted; and 2) to discuss the possibility of a plea bargain, if appropriate. It would be in your best interest to retain a lawyer to represent you at this meeting. I understand that Mr. Gonek has previously represented you. If such a meeting is beyond the scope of his representation and if you cannot afford to hire a lawyer, please submit this letter to the Federal Defender Office, 111 E. Court Street, Suite L-100, Flint, MI 48502, and request that an attorney be appointed for you at the government's expense.

Please contact me by **May 31, 2018** to advise if you are interested in having such a meeting or to advise if you have requested court-appointed counsel. If you or your attorney does not contact me by that date, I will assume that you are not interested in meeting to discuss this case, and I will proceed with this prosecution.

Sincerely,

MATTHEW SCHNEIDER
United States Attorney


Jules M. DePorre
Assistant United States Attorney



U.S. Department of Justice

Tax Division

*Northern Criminal Enforcement Section
P.O. Box 972, Ben Franklin Station
(202) 514-5150
Washington, D.C. 20044
Telefax: (202) 514-8455*

October 3, 2018

Jayson Rosett
c/o Ben Gonek
Defense Counsel
500 Griswold, Suite 2450
Detroit, MI 48226

Re: Grand Jury Investigation

Dear Mr. Rosett:

We write to inform you that you are a target of a federal grand jury's investigation in the Eastern District of Michigan. The Department of Justice possesses substantial evidence that, among other things, you participated in a scheme to engage in money laundering, in violation of 18 U.S.C. § 1956(h) and conspired to defraud an agency of the United States, specifically the Internal Revenue Service, in violation of 18 U.S.C. § 371.

Please have your attorney contact Mark McDonald at (202) 305-2672 to discuss this matter further.

Sincerely,

/s/ Mark McDonald
Mark McDonald
William Guappone
Trial Attorney